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BLOOD HURST & O'REARDON, LLP
Timothy G. Blood (*admitted pro hac vice*)
Thomas J. O'Reardon II (CA 247952)
(*Applicant for pro hac vice admission*)
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*Attorneys for Jun Dam and the Class in
Dam v. Perkins Coie, LLP, et al.,
Case No. 2:20-cv-00464-SAB (E.D. Wash.)*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington
corporation,

Debtor.

Case No: 18-03197 FPC 7

Hon. Frederick P. Corbit
Chapter 7

**MOTION TO ADMIT ATTORNEY
THOMAS J. O'REARDON II *PRO
HAC VICE* UNDER LOCAL CIVIL
RULE 83.2(c)(3)**

[No Hearing Requested]

Attorney Thomas J. O'Reardon II, a partner of Blood, Hurst & O'Reardon, LLP, respectfully moves this Court under Eastern District of Washington LBR 9010-1 and Eastern District L. Civ. R. 83.2(c) for an order granting the *pro hac vice* admission of Thomas J. O'Reardon II ("Applicant").

Local Civil Rule 83.2(c)(3) Compliance

Movant and Applicant submit the following information as required by Eastern District L. Civ. R. 8.2(c)(3). The information is confirmed and attested to in the accompanying Declaration of Thomas J. O'Reardon II.

A. Applicant's address and telephone number

Blood Hurst & O'Reardon, LLP
501 West Broadway, Suite 1490
San Diego, CA 92101
Tel: (619) 338-1100

B. Dates of admission to practice before other courts

Mr. O'Reardon is admitted to practice in the following courts:

- California State Courts as of 12/14/2006 (CA 247952)
- U.S. District Court, Southern District of California as of 4/12/2007
- U.S. District Court, Central District of California as of 4/12/2007
- U.S. District Court, Northern District of California as of 4/13/2007
- U.S. District Court, Eastern District of California as of 12/23/2009
- Ninth Circuit Court of Appeals as of 5/09/2011
- United States Circuit Court of Appeals for the Sixth (2/28/2012), and Eighth Circuits (5/29/2013)
- United States District Courts for the N.D. Illinois (12/05/2008)

C. Name, address and telephone number of admitted counsel with whom the Applicant will be associated

Dennis McGlothin (WSBA No. 28177)
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D. Necessity for appearance by Applicant

Applicant is one of the counsel for Plaintiff and the proposed Class in *Dam v. Perkins Coie, LLP, et al.*, Case No. 2:20-cv-00464-SAB (E.D. Wash.) (the "Class Action"). Applicant has been admitted *pro hac vice* in the Class Action.

Mr. O'Reardon is a partner of Blood Hurst & O'Reardon, LLP and specializes in class action litigation. Mr. O'Reardon has significant experience leading the litigation of complex class action lawsuits. He has been appointed lead counsel by numerous state and federal courts, including in complex and multidistrict litigation.

Applicant desires to appear and participate in this proceeding on behalf of the proposed Class, including to participate in depositions and present oral argument if permitted.

E. Disciplinary actions or sanctions

Mr. O'Reardon has no pending disciplinary sanction or actions and has never been subject to disciplinary sanctions by any court or Bar Association.

Conclusion

WHEREFORE, Applicant and Movant respectfully request that the Court enter an Order:

1. Granting the Application in its entirety;
2. Allowing Applicant Thomas J. O'Reardon II to participate in this case on a *pro hac vice* basis; and

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1 3. Granting any further relief the Court deems to be appropriate and
2 just.

3 Respectfully submitted on December 13, 2021.

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5 *s/ Dennis McGlothin*

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13 *Attorneys for Jun Dam and the Class in*
14 *Dam v. Perkins Coie, LLP, et al., Case*
15 *No. 2:20-cv-00464-SAB (E.D. Wash.)*

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will in turn automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed on December 13, 2021.

s/ Dennis McGlothlin

DENNIS J. MCGLOTHIN